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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

John Waudby,

Plaintiff,

v.

Trans Union, LLC, Experian  
Information Solutions, Inc., First  
Premier Bank and Green Dot  
Corporation,

Defendants.

Case No.: 2:22-cv-01889-RFB-DJA

**Motion for an extension of time for  
Trans Union, LLC to respond to  
Plaintiff's complaint**

**Second request**

John Waudby ("Plaintiff"), by and through counsel, hereby requests an extension of time for Defendant Trans Union, LLC ("Defendant") to respond to Plaintiff's complaint. Defendant's responsive pleading is currently due on February 8, 2023. This is the second request for an extension of this deadline.

The extension is sought because the parties are engaged in active settlement discussions and informal discovery to assist the case resolution efforts. Plaintiff does not oppose an extension of Defendant's time to answer

1 the complaint so that the parties may devote their energies to resolving this  
2 matter.

3 In good faith and not for the purposes of delay, Plaintiff submits this  
4 motion, on behalf of Defendant, and requests that this Court extend Defendant's  
5 deadline to file its responsive pleading until on or before **March 10, 2023**.

6 Dated: February 8, 2023.

7  
8 **FREEDOM LAW FIRM, LLC**

9 /s/ Gerardo Avalos  
10 George Haines, Esq.  
11 Gerardo Avalos, Esq.  
12 8985 South Eastern Ave., Suite 350  
13 Las Vegas, NV 89123  
14 *Attorneys for Plaintiff*

15  
16 IT IS SO ORDERED:

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18 \_\_\_\_\_  
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: February 9, 2023  
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